

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5500

Rachel Perillo

June 12, 2020

Via ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-referenced matter. On May 27, 2020, the Court granted Mr. Raji's bail application and Ordered that he be released pursuant to a \$100,000 personal recognizance bond signed by three "financially responsible persons" and secured by \$10,000 in collateral. We have since secured the \$10,000 in collateral and have confirmed two potential co-signers (the same two individuals mentioned in our bail application), but are having great difficulty securing a third co-signer. Given the exigent circumstances, i.e. Mr. Raji's vulnerable health and the COVID-19 pandemic, it is respectfully requested that the Court modify its May 27, 2020 Order to permit Mr. Raji's release pursuant to a \$100,000 bond signed by *two* financially responsible persons and secured by \$10,000 collateral. In the alternative, it is respectfully requested that the Court permit Mr. Raji's release with two co-signers on the condition that he procure a third co-signer within two weeks.

If the Court has any questions regarding this matter please contact my office. I thank your Honor for your time and attention to this matter.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Dina McCleod (By ECF)
AUSA Eun Young Choi (By ECF)